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14 **IN THE UNITED STATES DISTRICT COURT**
15 **FOR THE TERRITORY OF GUAM**
16

17 UNITED STATES OF AMERICA,
18
19 Plaintiff,

20 vs.
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22
23 SONG JA CHA,
and
24 IN HAN CHA,

25 Defendants.
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FILED
DISTRICT COURT OF GUAM

JUL 23 2008

JEANNE G. QUINATA
Clerk of Court

CRIMINAL CASE NO. 08-00008

SUPERSEDING INDICTMENT

CONSPIRACY

[18 U.S.C. § 371]

(Count I)

SEX TRAFFICKING

[18 U.S.C. §§ 1591, 1594 & 2]

(Counts II through X)

**COERCION & ENTICEMENT TO
TRAVEL FOR PURPOSE OF
PROSTITUTION**

[18 U.S.C. §§ 2422 & 2]

(Counts XI through XX)

FORFEITURE ALLEGATION

[18 U.S.C. § 1594(b)]

(Count XXI)

1 THE GRAND JURY CHARGES:

2 **COUNT I - CONSPIRACY TO COMMIT SEX TRAFFICKING & FOREIGN**
3 **TRANSPORTATION FOR PROSTITUTION**

4 Introductory Allegations

5 1. At all times relevant to this Indictment, SONG JA CHA and IN HAN CHA,
6 defendants, husband and wife, were the owners and operators of a business identified as the
7 "Blue House," located in Tamuning, Guam. SONG JA CHA and IN HAN CHA owned,
8 operated, managed and controlled the "Blue House." Although licensed as a retail business for
9 the sale of food and sodas, SONG JA CHA and IN HAN CHA operated the "Blue House" as a
10 commercial sex house.

11 2. Defendants SONG JA CHA and IN HAN CHA employed other employees, both
12 known and unknown to the grand jury, who acted as enforcers and recruiters, both on the island
13 of Chuuk and in the District of Guam.

14 3. At all times relevant to this Indictment, prostitution is illegal in the District of
15 Guam, pursuant to 9 Guam Code Annotated 28.30(a)(1).

16 4. At all times relevant to this Indictment, the Compact of Free Association
17 permits Chuukese Nationals from the Federated States of Micronesia to travel and work in the
18 United States and its Territories, and D.R., So.S, Si.S, E.N., M.C., L.P., K.C., A.T., N.T., and
19 Arn. T., were all Chuukese nationals and citizens from the Federated States of Micronesia.

20 The Scheme

21 5. Beginning in or about 2004, SONG JA CHA and IN HAN CHA, the defendants,
22 together with others known and unknown to the Grand Jury, began operating an illegal
23 commercial sex house at the "Blue House." To further this scheme, the defendants, co-
24 conspirators, and others: a) fraudulently misrepresented to D.R., So.S., Si.S., E.N. M.C., L.P.,
25 K.C., A.T., N.T., Arn. T., and others that they would be employed in paid, lawful jobs; (b)
26 misrepresented that the "Blue House" was a lawful business enterprise; (c) misrepresented that
27 SONG JA CHA and IN HAN CHA, as employers, would send the victims' earned income to
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1 their family members; (d) misrepresented to D.R., So.S., Si.S., E.N. M.C., L.P., K.C., A.T., N.T.,
2 and Arn. T., and others that they would be paid a fair and legal wage for their work at the "Blue
3 House," (e) induced, persuaded, enticed and coerced D.R., So.S., Si.S., E.N. M.C., L.P., K.C.,
4 A.T., N.T., Arn. T., and others ("Victims") to travel from Chuuk, Federated States of Micronesia
5 ("FSM") to the District of Guam; and f) used force, fraud, and coercion to compel D.R., Si.S.,
6 E.N. M.C., L.P., K.C., A.T., N.T., Arn. T., and others to engage in acts of prostitution.

7 The Conspiracy

8 6. From in or about February 2004, continuing to on or about January 14, 2008, in the
9 District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants, together
10 with others known and unknown to the Grand Jury, unlawfully, willfully, intentionally, and
11 knowingly did conspire, confederate and agree, together and with each other, to commit offenses
12 against the United States, to wit, to commit sex trafficking in violation of Title 18, United States
13 Code, Sections 1591, 1594, and 2; and to commit interstate and foreign transportation of persons
14 for purposes of prostitution in violation of Title 18, United States Code, Sections 2422 and 2.

15 7. It was a part and object of the conspiracy that SONG JA CHA and IN HAN CHA,
16 the defendants, and their co-conspirators, in and affecting interstate and foreign commerce,
17 recruited, enticed, harbored, transported, provided and obtained by any means the Victims, and
18 benefitted, financially and by receiving a thing of value, from participation in a venture which
19 has engaged in commercial sex acts, knowing that fraud, force and coercion, as defined in Title
20 18, United States Code, Section 1591, would be used to cause the Victims to engage in such acts,
21 and knowing that A.T. had not attained the age of 18 years and would be caused to engage in a
22 commercial sex act, in violation of Title 18, United States Code, Section 1591.

23 8. It was further a part and object of the conspiracy that SONG JA CHA and IN HAN
24 CHA, the defendants and their co-conspirators, knowingly persuaded, induced, enticed and
25 coerced individuals, to wit: D.R., So.S., Si.S., E.N. M.C., L.P., K.C., A.T., N.T., Arn. T., and
26 others, to travel in interstate and foreign commerce, and in any Territory and Possession of the
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1 United States, with the intent that such individuals engage in prostitution and in sexual activity
2 for which those individuals may be charged with a criminal offense, and using the mail and any
3 facility and means of interstate and foreign commerce, and within the special maritime and
4 territorial jurisdiction of the United States, knowingly persuaded, induced, enticed and coerced
5 A.T., an individual who had not attained the age of 18 years, to engage in prostitution and in
6 sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
7 §28.30(a)(1), (b)(1) and 4.60, in violation of Title 18, United States Code, Sections 2422 and 2.

8 **Means and Method of the Conspiracy**

9 9. Among the means and methods by which SONG JA CHA and IN HAN CHA, the
10 defendants, together with others known and unknown to the Grand Jury, would and did carry out
11 the conspiracy, were the following:

12 a. SONG JA CHA, the defendant, and her co-conspirators, made false promises to the
13 Victims, to wit: that they would be lawfully employed at the "Blue House" as waitresses or store
14 clerks; that they would receive regular money payments for their work; and that the employers
15 would pay for their transportation, passports, housing, and food.

16 b. SONG JA CHA and IN HAN CHA, the defendants, and their co-conspirators,
17 arranged to the acquisition of FSM passports and airline tickets, so that the Victims could travel
18 to Guam.

19 c. SONG JA CHA and IN HAN CHA, the defendants, and their co-conspirators,
20 arranged to transfer money from the District of Guam to recruiters on the island of Chuuk.

21 d. SONG JA CHA and IN HAN CHA, the defendants, and their co-conspirators,
22 arranged that the Victims would be picked up upon arriving in Guam and transported to the
23 "Blue House."

24 e. SONG JA CHA and IN HAN CHA, the defendants, and their co-conspirators, caused
25 the Victims to engage in acts of prostitution in the District of Guam, by using force, fraud, and
26 coercion, to wit: threats of physical, economic, legal, and emotional harm; physical battery;
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1 abuse of legal process; confiscation of passports; withholding food; manipulation of debts;
2 forced injections of birth control; verbal abuse; close supervision; monitoring communications;
3 and isolation.

4 f. SONG JA CHA and IN HAN CHA, the defendants, and their co-conspirators
5 benefitted financially, and by receiving anything of value, from participating in the venture.

6 g. SONG JA CHA and IN HAN CHA, the defendants, and their co-conspirators, caused
7 the Victims to continue their services as prostitutes in the District of Guam, by using force, fraud,
8 and coercion, to wit: threats of physical, economic, legal, and emotional harm; physical battery;
9 abuse of legal process; confiscation of passports; withholding food; manipulation of debts;
10 forced injections of birth control; verbal abuse; close supervision; monitoring communications;
11 and isolation.

12 Overt Acts

13 10. In furtherance of the conspiracy and to effect the objects thereof, the conspirators
14 committed and caused to be committed the following overt acts, among others, within the
15 District of Guam and elsewhere:

16 a. Beginning in or about 2004, Defendants SONG JA CHA and IN HAN CHA, and
17 others known and unknown to the Grand Jury, opened the "Blue House," and operated the "Blue
18 House" as a commercial sex house.

19 b. In or about February 2004, Defendant SONG JA CHA, and others known and
20 unknown to the Grand Jury, traveled to Chuuk with the intention of locating and recruiting young
21 women who could be brought to the District of Guam, to work for the Blue House.

22 c. From in or about February 2004 through on or about January 14, 2008, SONG JA
23 CHA, the defendant, and her co-conspirators, through unnamed co-actors and co-conspirators,
24 made materially false and misleading statements to the Victims and others known and unknown
25 regarding the availability of lawful jobs with SONG JA CHA and IN HAN CHA in the District
26 of Guam.

1 d. On or about February 12, 2004, SONG JA CHA and IN HAN CHA, the defendants,
2 and their co-conspirators induced Arn. T. to travel in interstate and foreign commerce, by making
3 promises of a legitimate, well-paying job; and by purchasing a ticket for travel from Chuuk,
4 F.S.M. to the District of Guam.

5 e. On or about April 1, 2006, SONG JA CHA and IN HAN CHA, the defendants, and
6 their co-conspirators, induced A.T., an individual who had not attained the age of eighteen, to
7 travel in interstate and foreign commerce, using the telephone, wire transfers, and other facilities
8 and means of interstate and foreign commerce, by making promises of a legitimate, well-paying
9 job; by purchasing a ticket for travel from Chuuk, F.S.M. to the District of Guam; and arranging
10 for A.T. to receive an F.S.M. passport.

11 f. On or about May 3, 2007, SONG JA CHA and IN HAN CHA, the defendants, and
12 their co-conspirators induced K.C. to travel in interstate and foreign commerce, by making
13 promises of a legitimate, well-paying job; by purchasing a ticket for travel from Chuuk, F.S.M. to
14 the District of Guam; and arranging for K.C. to receive an F.S.M. passport.

15 g. On or about June 19, 2007, SONG JA CHA and IN HAN CHA, the defendants, and
16 their co-conspirators induced E.N. to travel in interstate and foreign commerce, by making
17 promises of a legitimate, well-paying job; and by purchasing a ticket for travel from Chuuk,
18 F.S.M. to the District of Guam.

19 h. On or about October 4, 2007, SONG JA CHA and IN HAN CHA, the defendants, and
20 their co-conspirators induced So.S. to travel in interstate and foreign commerce, by making
21 promises of a legitimate, well-paying job; by purchasing a ticket for travel from Chuuk, F.S.M. to
22 the District of Guam; and arranging for So.S. to receive an F.S.M. passport.

23 i. On or about October 18, 2007, SONG JA CHA and IN HAN CHA, the defendants,
24 and their co-conspirators induced L.P. to travel in interstate and foreign commerce, by making
25 promises of a legitimate, well-paying job; and by purchasing a ticket for travel from Chuuk,
26 F.S.M. to the District of Guam.

1 j. On or about October 18, 2007, SONG JA CHA and IN HAN CHA, the defendants,
2 and their co-conspirators induced M.C. to travel in interstate and foreign commerce, by making
3 promises of a legitimate, well-paying job; by purchasing a ticket for travel from Chuuk, F.S.M. to
4 the District of Guam; and by arranging for M.C. to receive an F.S.M. passport.

5 k. On or about December 11, 2007, SONG JA CHA and IN HAN CHA, the defendants,
6 and their co-conspirators induced D.R. to travel in interstate and foreign commerce, by making
7 promises of a legitimate, well-paying job; by purchasing a ticket for travel from Chuuk, F.S.M. to
8 the District of Guam; and by arranging for D.R. to receive an F.S.M. passport.

9 l. On or about December 12, 2007, SONG JA CHA and IN HAN CHA, the defendants,
10 and their co-conspirators induced Si.S. to travel in interstate and foreign commerce, by making
11 promises of a legitimate, well-paying job; by purchasing a ticket for travel from Chuuk, F.S.M. to
12 the District of Guam.

13 m. On or about December 27, 2007, SONG JA CHA and IN HAN CHA, the defendants,
14 and their co-conspirators induced N.T. to travel in interstate and foreign commerce, by making
15 promises of a legitimate, well-paying job; and by purchasing a ticket for travel from Chuuk,
16 F.S.M. to the District of Guam.

17 n. Beginning in or about February 2004, and continuing through on or about January 14,
18 2008, SONG JA CHA, the defendant, and her co-conspirators, informed the Victims on their
19 respective dates of arrival in the District of Guam that their job was "to make the customers
20 happy," which entailed performing commercial sex acts with customers.

21 o. Beginning in or about February 2004 and continuing through on or about January 14,
22 2008, SONG JA CHA, the defendant, and her co-conspirators, repeatedly told the Victims and
23 others that if they ran away from the Blue House, that the police would arrest them and place
24 them in jail.

25 p. Beginning in or about February 2004, and continuing through on or about December
26 27, 2007, SONG JA CHA and IN HAN CHA, the defendants, and others known and unknown to
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1 the Grand Jury, confiscated the passports of the Victims on or about their respective dates of
2 arrival in the District of Guam.

3 q. Beginning in or about February 2004 and continuing through on or about January 14,
4 2008, SONG JA CHA, the defendant, and her co-conspirators, monitored all telephone calls
5 made by D.R., Si.S., E.N. M.C., L.P., K.C., A.T., N.T., and Arn. T.

6 r. On multiple occasions between in or about February 2004 and continuing through on
7 or about January 14, 2008, SONG JA CHA, the defendant, and her co-conspirators, yelled and
8 verbally abused D.R., Si.S., E.N. M.C., L.P., K.C., N.T., A.T., and Arn. T., and withheld food
9 from D.R., Si.S., E.N. M.C., L.P., K.C., N.T., and A.T., after male customers complained about
10 their "work" performance.

11 s. On multiple occasions between in or about May 2007 and continuing through on or
12 about January 14, 2008 SONG JA CHA, the defendant, and others, assaulted K.C., by slapping
13 K.C.'s face, striking K.C., kicking K.C., pulling K.C.'s hair and dragging K.C. across broken
14 glass.

15 t. On multiple occasions between on or about June 19, 2007 and continuing through in or
16 about February 2008, SONG JA CHA assaulted E.N., by slapping E.N.'s face, striking E.N.,
17 kicking E.N., pulling E.N.'s hair and hitting E.N. with a broom handle.

18 u. On multiple occasions between April 2006 and continuing to on or about October
19 2007, SONG JA CHA assaulted A.T., by slapping A.T.'s face, striking A.T., kicking A.T.,
20 pulling A.T.'s hair and hitting A.T. with a broom handle.

21 v. On multiple occasions between April 2006 and continuing to on or about January
22 2008, SONG JA CHA, the defendant, and others known and unknown to the Grand Jury, took
23 D.R., Si.S., E.N. M.C., L.P., K.C., N.T., and A.T., to a clinic where they were injected with birth
24 control shots.

25 w. On multiple occasions between April 2006 and continuing to on or about January
26 2008, SONG JA CHA and IN HAN CHA, the defendants, and others known and unknown to the
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1 Grand Jury, monitored the Victims using video surveillance.

2 x. From in or about February 2004 through on or about January 14, 2008, SONG JA
3 CHA, the defendant, caused D.R., Si.S., E.N. M.C., L.P., K.C., A.T., N.T., and Arn. T., to
4 perform sexual acts at the Blue House through force, fraud, and coercion.

5 All in violation of Title 18, United States Code, Section 371.

6 **COUNT II - SEX TRAFFICKING**

7 11. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
8 one (1) through ten (10) as if fully set forth herein.

9 12. Beginning in or about May 2007, and continuing through on or about January 14,
10 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants,
11 aiding and abetting each other, in and affecting interstate and foreign commerce, unlawfully,
12 knowingly and wilfully recruited, enticed, harbored, transported, provided, and obtained by any
13 means K.C., a Chuukese national, or attempted to do so, and benefitted, financially and by
14 receiving a thing of value, from participation in a venture which has engaged in commercial sex
15 acts, knowing that fraud, force and coercion, as defined in Title 18, United States Code, Sections
16 1591(c)(2), would be used to cause K.C. to engage in such acts.

17 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

18 **COUNT III - SEX TRAFFICKING**

19 13. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
20 one (1) through twelve (12) as if fully set forth herein.

21 14. Beginning on or about June 19, 2007, and continuing through in or about February
22 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants,
23 aiding and abetting each other, in and affecting interstate and foreign commerce, unlawfully,
24 knowingly and wilfully recruited, enticed, harbored, transported, provided and obtained by any
25 means E.N., a Chuukese national, or attempted to do so, and benefitted, financially and by
26 receiving a thing of value, from participation in a venture which has engaged in commercial sex
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1 acts, knowing that fraud, force and coercion, as defined in Title 18, United States Code, Sections
2 1591(c)(2), would be used to cause E.N. to engage in such acts.

3 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

4 **COUNT IV - SEX TRAFFICKING**

5 15. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
6 one (1) through fourteen (14) as if fully set forth herein.

7 16. Beginning on or about October 4, 2007, and continuing through on or about January
8 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
9 defendants, aiding and abetting each other, in and affecting interstate and foreign commerce,
10 unlawfully, knowingly and wilfully recruited, enticed, harbored, transported, provided and
11 obtained by any means So.S., a Chuukese national, or attempted to do so, and benefitted,
12 financially and by receiving a thing of value, from participation in a venture which has engaged
13 in commercial sex acts, knowing that fraud, force and coercion, as defined in Title 18, United
14 States Code, Sections 1591(c)(2), would be used to cause So.S. to engage in such acts.

15 All in violation of Title 18, United States Code, Sections 1591, 1594, and 2.

16 **COUNT V - SEX TRAFFICKING**

17 17. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
18 one (1) through sixteen (16) as if fully set forth herein.

19 18. Beginning on or about October 18, 2007, and continuing through on or about
20 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
21 defendants, aiding and abetting each other, in and affecting interstate and foreign commerce,
22 unlawfully, knowingly and wilfully recruited, enticed, harbored, transported, provided and
23 obtained by any means L.P., a Chuukese national, or attempted to do so, and benefitted,
24 financially and by receiving a thing of value, from participation in a venture which has engaged
25 in commercial sex acts, knowing that fraud, force and coercion, as defined in Title 18, United
26 States Code, Sections 1591(c)(2), would be used to cause L.P. to engage in such acts.

1 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

2 **COUNT VI - SEX TRAFFICKING**

3 19. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
4 one (1) through eighteen (18) as if fully set forth herein.

5 20. Beginning on or about October 18, 2007, and continuing through on or about
6 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
7 defendants, aiding and abetting each other, in and affecting interstate and foreign commerce,
8 unlawfully, knowingly and wilfully recruited, enticed, harbored, transported, provided and
9 obtained by any means M.C., a Chuukese national, or attempted to do so, and benefitted,
10 financially and by receiving a thing of value, from participation in a venture which has engaged
11 in commercial sex acts, knowing that fraud, force and coercion, as defined in Title 18, United
12 States Code, Sections 1591(c)(2), would be used to cause M.C. to engage in such acts.

13 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

14 **COUNT VII - SEX TRAFFICKING**

15 21. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
16 one (1) through twenty (20) as if fully set forth herein.

17 22. Beginning on or about December 11, 2007, and continuing through on or about
18 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
19 defendants, aiding and abetting each other, in and affecting interstate and foreign commerce,
20 unlawfully, knowingly and wilfully recruited, enticed, harbored, transported, provided and
21 obtained by any means D.R., a Chuukese national, or attempted to do so, and benefitted,
22 financially and by receiving a thing of value, from participation in a venture which has engaged
23 in commercial sex acts, knowing that fraud, force and coercion, as defined in Title 18, United
24 States Code, Sections 1591(c)(2), would be used to cause D.R. to engage in such acts.

25 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.
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1 **COUNT VIII - SEX TRAFFICKING**

2 23. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
3 one (1) through twenty-two (22) as if fully set forth herein.

4 24. Beginning on or about December 12, 2007, and continuing through on or about
5 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
6 defendants, aiding and abetting each other, in and affecting interstate and foreign commerce,
7 unlawfully, knowingly and wilfully recruited, enticed, harbored, transported, provided and
8 obtained by any means Si.S., a Chuukese national, or attempted to do so, and benefitted,
9 financially and by receiving a thing of value, from participation in a venture which has engaged
10 in commercial sex acts, knowing that fraud, force and coercion, as defined in Title 18, United
11 States Code, Sections 1591(c)(2), would be used to cause Si.S. to engage in such acts.

12 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

13 **COUNT IX - SEX TRAFFICKING**

14 25. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
15 one (1) through twenty-four (24) as if fully set forth herein.

16 26. Beginning on or about December 27, 2007, and continuing through on or about
17 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
18 defendants, aiding and abetting each other, in and affecting interstate and foreign commerce,
19 unlawfully, knowingly and wilfully recruited, enticed, harbored, transported, provided and
20 obtained by any means N.T., a Chuukese national, or attempted to do so, and benefitted,
21 financially and by receiving a thing of value, from participation in a venture which has engaged
22 in commercial sex acts, knowing that fraud, force and coercion, as defined in Title 18, United
23 States Code, Sections 1591(c)(2), would be used to cause N.T. to engage in such acts.

24 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

25 **COUNT X - SEX TRAFFICKING OF A MINOR**

26 27. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs
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1 one (1) through twenty-six (26) as if fully set forth herein.

2 28. In or about April 2006, and continuing through in or about October 2007, in the
3 District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants, aiding and
4 abetting each other, in and affecting interstate and foreign commerce, unlawfully, knowingly and
5 wilfully recruited, enticed, harbored, transported, provided and obtained by any means A.T., a
6 Chuukese national, or attempted to do so, and benefitted, financially and by receiving a thing of
7 value, from participation in a venture which has engaged in commercial sex acts, knowing that
8 the person has not attained the age of 18 years and will be caused to engage in a commercial sex,
9 and knowing that fraud, force and coercion, as defined in Title 18, United States Code, Sections
10 1591(c)(2), would be used to cause A.T. to engage in such acts.

11 All in violation of Title 18, United States Code, Sections 1591, 1594 and 2.

12 **COUNT XI - COERCION AND ENTICEMENT TO TRAVEL**

13 **FOR PURPOSE OF FOR PROSTITUTION**

14 29. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
15 (1) through twenty-eight (28) as if fully set forth herein.

16 30. Beginning in or about May 2007, and continuing through on or about January 14,
17 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants,
18 aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded, induced, enticed,
19 and coerced K.C. to travel in interstate and foreign commerce, and in any Territory and
20 Possession of the United States, with the intent that K.C. engage in prostitution and in sexual
21 activity which would constitute a criminal offense under 9 Guam Code Annotated §28.30(a)(1),
22 (b)(1) and 4.60.

23 All in violation of Title 18, United States Code, Sections 2422 and 2.

24 **COUNT XII - COERCION AND ENTICEMENT TO TRAVEL**

25 **FOR PURPOSE OF FOR PROSTITUTION**

26 31. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
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1 (1) through thirty (30) as if fully set forth herein.

2 32. Beginning on or about June 19, 2007 and continuing through in or about February 4,
3 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
4 defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
5 induced, enticed, and coerced E.N. to travel in interstate and foreign commerce, and in any
6 Territory and Possession of the United States, with the intent that E.N. engage in prostitution and
7 in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
8 §28.30(a)(1), (b)(1) and 4.60.

9 All in violation of Title 18, United States Code, Sections 2422 and 2.

10 **COUNT XIII - COERCION AND ENTICEMENT TO TRAVEL**

11 **FOR PURPOSE OF FOR PROSTITUTION**

12 33. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
13 (1) through thirty-two (32) as if fully set forth herein.

14 34. Beginning on or about October 4, 2007, and continuing through on or about January
15 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
16 defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
17 induced, enticed, and coerced So.S. to travel in interstate and foreign commerce, and in any
18 Territory and Possession of the United States, with the intent that So.S. engage in prostitution
19 and in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
20 §28.30(a)(1), (b)(1) and 4.60.

21 All in violation of Title 18, United States Code, Sections 2422 and 2.

22 **COUNT XIV - COERCION AND ENTICEMENT TO TRAVEL**

23 **FOR PURPOSE OF FOR PROSTITUTION**

24 35. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
25 (1) through thirty-four (34) as if fully set forth herein.

26 36. Beginning on or about October 18, 2007, and continuing through on or about January
27
28

1 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
2 defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
3 induced, enticed, and coerced L.P. to travel in interstate and foreign commerce, and in any
4 Territory and Possession of the United States, with the intent that L.P. engage in prostitution and
5 in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
6 §28.30(a)(1), (b)(1) and 4.60.

7 All in violation of Title 18, United States Code, Sections 2422 and 2.

8 **COUNT XV - COERCION AND ENTICEMENT TO TRAVEL**

9 **FOR PURPOSE OF FOR PROSTITUTION**

10 37. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
11 (1) through thirty-six (36) as if fully set forth herein.

12 38. Beginning on or about October 18, 2007, and continuing through on or about January
13 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the
14 defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
15 induced, enticed, and coerced M.C. to travel in interstate and foreign commerce, and in any
16 Territory and Possession of the United States, with the intent that M.C. engage in prostitution and
17 in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
18 §28.30(a)(1), (b)(1) and 4.60.

19 All in violation of Title 18, United States Code, Sections 2422 and 2.

20 **COUNT XVI - COERCION AND ENTICEMENT TO TRAVEL**

21 **FOR PURPOSE OF FOR PROSTITUTION**

22 39. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
23 (1) through thirty-eight (38) as if fully set forth herein.

24 40. Beginning on or about December 11, 2007, and continuing through on or about
25 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA,
26 the defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
27

1 induced, enticed, and coerced D.R. to travel in interstate and foreign commerce, and in any
2 Territory and Possession of the United States, with the intent that D.R. engage in prostitution and
3 in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
4 §28.30(a)(1), (b)(1) and 4.60.

5 All in violation of Title 18, United States Code, Sections 2422 and 2.

6 **COUNT XVII - COERCION AND ENTICEMENT TO TRAVEL**

7 **FOR PURPOSE OF FOR PROSTITUTION**

8 41. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
9 (1) through forty (40) as if fully set forth herein.

10 42. Beginning on or about December 12, 2007, and continuing through on or about
11 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA,
12 the defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
13 induced, enticed, and coerced Si.S. to travel in interstate and foreign commerce, and in any
14 Territory and Possession of the United States, with the intent that Si.S. engage in prostitution and
15 in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
16 §28.30(a)(1), (b)(1) and 4.60.

17 All in violation of Title 18, United States Code, Sections 2422 and 2.

18 **COUNT XVIII - COERCION AND ENTICEMENT TO TRAVEL**

19 **FOR PURPOSE OF FOR PROSTITUTION**

20 43. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
21 (1) through forty-two (42) as if fully set forth herein.

22 44. Beginning on or about December 27, 2007, and continuing through on or about
23 January 14, 2008, in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA,
24 the defendants, aiding and abetting each other, unlawfully, wilfully and knowingly, persuaded,
25 induced, enticed, and coerced N.T. to travel in interstate and foreign commerce, and in any
26 Territory and Possession of the United States, with the intent that N.T. engage in prostitution and
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1 in sexual activity which would constitute a criminal offense under 9 Guam Code Annotated
2 §28.30(a)(1), (b)(1) and 4.60.

3 All in violation of Title 18, United States Code, Sections 2422 and 2.

4 **COUNT XIX - COERCION AND ENTICEMENT TO TRAVEL**

5 **FOR PURPOSE OF FOR PROSTITUTION**

6 45. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
7 (1) through forty-four (44) as if fully set forth herein.

8 46. Beginning in or about April 2006, and continuing through in or about October 2007,
9 in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants,
10 aiding and abetting each other, knowingly persuaded, induced, enticed and coerced A.T., to travel
11 in interstate and foreign commerce, and in any Territory or Possession of the United States, with
12 the intent that A.T. engage in prostitution and in sexual activity which would constitute a
13 criminal offense under 9 Guam Code Annotated §28.30(a)(1), (b)(1) and 4.60.

14 All in violation of Title 18, United States Code, Sections 2422 and 2.

15 **COUNT XX - COERCION AND ENTICEMENT OF A MINOR**

16 **TO TRAVEL FOR PURPOSE OF FOR PROSTITUTION**

17 47. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
18 (1) through forty-six (46) as if fully set forth herein.

19 48. Beginning in or about April 2006, and continuing through in or about October 2007,
20 in the District of Guam and elsewhere, SONG JA CHA and IN HAN CHA, the defendants,
21 aiding and abetting each other, knowingly transported A.T., an individual who had not attained
22 the age of 18 years, in interstate and foreign commerce, and in any possession and territory of the
23 United States, with the intent that A.T. engage in prostitution and in sexual activity which would
24 constitute a criminal offense under 9 Guam Code Annotated §28.30(a)(1), (b)(1) and 4.60.

25 All in violation of Title 18, United States Code, Sections 2423 and 2.

1 **COUNT XXI - FORFEITURE ALLEGATION**

2 49. The Grand Jury realleges, adopts and incorporates the allegations of paragraphs one
3 (1) through forty-eight (48) as if fully set forth herein.

4 50. Upon conviction of one or more of the offenses alleged in Counts 1 through 20 of
5 this Indictment, defendants SONG JA CHA and IN HAN CHA, shall forfeit to the United States,
6 pursuant to 18 U.S.C. § 1594(b), any property, real or personal, constituting, or derived from, any
7 proceeds the defendant obtained, directly or indirectly, as the result of such violations, and any
8 property, real or personal, that was used or intended to be used to commit or to facilitate the
9 commission of such violations. If more than one defendant is convicted of an offense, the
10 defendants so convicted are jointly and severally liable for the amount involved in such offense.

11 The property to be forfeited includes, but is not limited to:

12 **CASH PROCEEDS**

13 Approximately \$250,543.44 in U.S. Currency, in that such sum in aggregate was received
14 in exchange for the unlawful sex trafficking or foreign transportation for prostitution, or is
15 traceable thereto.

16 51. If any of the property described above as being subject to forfeiture, as a result of
17 any act or omission of the defendants SONG JA CHA and IN HAN CHA:

- 18 a. cannot be located upon the exercise of due diligence;
19 b. has been transferred, sold to, or deposited with, a third party;
20 c. has been placed beyond the jurisdiction of the Court;
21 d. has been substantially diminished in value; or
22 e. has been commingled with other property which cannot be subdivided without
23 difficulty;

24 it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) as
25 incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other
26 property of said defendants up to the value of the above forfeitable property.

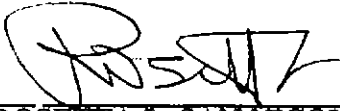
1 All pursuant to Title 18, United States Code, Section 1594(b).

2 Dated this 23rd day of July 2008.

3
4
5 REDACTED


6
7 LEONARDO M. RAPADAS
8 United States Attorney
9 Districts of Guam and the NMI

10 By:

11 
12 ROSETTA L. SAN NICOLAS
13 Assistant U.S. Attorney

14 Approved:

15 By:

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17 JEFFREY J. STRAND
18 First Assistant U.S. Attorney
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